

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

The Use of N11 Codes and Other
Abbreviated Dialing Arrangements

)
) CC Docket No. 92-105
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)

Reply Comments of the
INFORMATION INDUSTRY ASSOCIATION

ORIGINAL
FILE

INFORMATION INDUSTRY ASSOCIATION
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Reply Comments of the
INFORMATION INDUSTRY ASSOCIATION

The Information Industry Association ("IIA") hereby files these reply comments to the Notice of Proposed Rulemaking concerning the use of N11 Codes and other Abbreviated Dialing Arrangements in the above-captioned docket.¹ IIA is a trade association of some 600 companies pursuing business opportunities associated with the creation, distribution and use of information. Since 1968, IIA has grown to include entrepreneurs and established companies that use a wide range of communications media, including common carriers, to distribute information worldwide.

As IIA stated in its initial comments, we welcome the Commission's interest in encouraging access to enhanced services by implementing abbreviated dialing. Three-digit dialing could provide consumers competitive access to a variety of information services in a simplified and easily remembered format. However, given the limited availability of such numbers -- in "N11" or other three digit combinations -- IIA does not believe that a commitment to immediate assignment would be in the best interest of American business or the public. In these reply comments we will clarify points made in our initial comments about what the Association believes to be necessary for fair and expeditious allocation of this important resource.

The limited availability of three-digit dialing resources has led IIA to

¹The Use of N11 Codes and Other Abbreviated Arrangements, CC Docket No. 92-105 (released May 8, 1992) ("N11 Codes Proceeding").

recommend that assignment of N11 numbers be reserved either for area codes or as prefixes in seven or 10 digit information access codes.² IIA also believes that any use of existing abbreviated dialing formats should be limited to current, non-enhanced, rate-regulated services. No enhanced services should be offered via three-digit access by any provider until the Commission is satisfied, based upon further investigation, that full competitive equality is available to any information provider interested in the service.

IIA further urges that resolution of the current issues -- in a three-, seven- or 10-digit format -- be accomplished as rapidly as possible to assure that no provider ready to offer the services through abbreviated dialing access is disadvantaged by further delay. This will ensure that the eventual assignment of these numbers will reflect balanced national number assignment policies; promote diversity of services; and allow for consistency in access and availability.³

Despite the value associated with any abbreviated dialing scheme, IIA notes that many of the commenting parties also agreed that fairness will ultimately require that allocations should be based on national guidelines that promote diversity and

²IIA previously noted that other three-digit, abbreviated numbers are possible under the North American Numbering Plan. Although few combinations may actually be available, the Commission should consider the value of requiring the reservation of other number combinations and incorporating other Commission study of three-digit numbers into this proceeding. See also N11 Codes Proceeding at 3, fn. 2.

³IIA has learned that all six N11 combinations -- 211, 311, 511, 611, 711 and 811 -- are not available in all jurisdictions subject to federal regulation. The Commission should consider a rational approach for three-digit use that fairly meets the interests of the public, information providers and carriers. See generally comments of Municipality of Anchorage, the Commonwealth of Puerto Rico and Bell Communications Research, Use of N11 Codes and Other Abbreviated Arrangements, CC Docket No. 92-105 (filed June 5, 1992).

consistency for businesses and consumers across the country.⁴ IIA stresses that new numbers -- "N11-XXXX" or "(N11)-XXX-XXXX" -- should be assigned within a format to assure uniform access by all interested providers. IIA does not agree with those who argue that assignment of numbers should be left to the discretion of local exchange carriers ("LECs").⁵ LECs should not be relied upon to guarantee national consistency in number use and assignment, nor should they be placed in the unfair position of deciding how best to provide equity and assure the public interest in allocation if an abbreviated dialing scheme is adopted.

Alternative abbreviated dialing codes should be allocated 1) on a fair and equitable basis that guarantees the same opportunities for all players, and 2) under a rational plan that makes these codes consistently available for regional and national services. Premature assignment to a single company or group of interests will only prejudice businesses that may offer valuable future contributions to the information industry and the public at large.

Finally, IIA reiterates that a numbering scheme does not, and should not, automatically determine a particular access arrangement. Line-side or trunk-side access to abbreviated dialing must not create service components of the local or regional network. Users of abbreviated dialing assignments should not targeted for

⁴See generally Comments of American Telegraph and Telephone Company, MCI, Central Telephone Company, Sprint Corporation, U S West, Ameritech Operating Companies, Datatrex, Rochester Telephone Corporation, Information Technology Association of America, GTE Services Corporation, Metropolitan Fiber Systems, New York and New England Telephone and Southwestern Bell Telephone Company, Use of N11 Codes and Other Abbreviated Arrangements, CC Docket 92-105 (filed June 5, 1992).

⁵See, e.g., National Telephone Cooperative Association, Municipality of Anchorage, Cox Enterprises, Use of N11 Codes and Other Abbreviated Arrangements, CC Docket 92-105 (filed June 5, 1992).

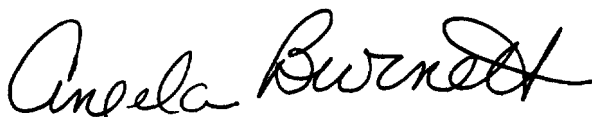
special treatment that results in tariff categories limited to enhanced service providers. Further, despite a chosen central office configuration, abbreviated dialing should not necessarily be equated to Feature Group B or D access or special access charges for "950-XXXX" or "800-XXX-XXXX." Rates applied to N11 dialing arrangements should be based upon directly associated costs.

Conclusion

IIA again commends the Commission for addressing this issue and encourages it to bring this matter to expeditious closure. Three-digit dialing, through the use of N11 exchanges, can provide consumers competitive access to a variety of information services in a simplified and easily remembered format. However, adoption of a three-digit assignment scheme at the present time, for any information provider using these codes, would only serve to limit the vast capability of nationally accessible information services. IIA urges the Commission to adopt rules that guarantee fairness and competitiveness to the benefit of the public interest.

Respectfully submitted,

INFORMATION INDUSTRY ASSOCIATION

A handwritten signature in black ink, reading "Angela Burnett". The signature is fluid and cursive, with a large initial 'A' and a stylized 'B'.

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